

September 27, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion

Dear Ms. Dortch,

Thomas Beresnyak writes to express concern about the Federal Communications Commission's strategies for evaluating broadband deployment outlined in its Fourteenth Broadband Deployment Report Notice of Inquiry.

Access to affordable and reliable broadband remains a critical issue for millions of individuals in the United States. I live and work in rural southwestern Pennsylvania. Our prospects for advancing agriculture, education and quality of life in this region will hinge on the availability of broadband internet access. We can't wait another 5, 10 or 15 years - we need to see progress and deployment immediately.

In order to ensure that the deployment of broadband services is being evaluated accurately, and that the FCC is taking the appropriate steps to address the country's digital divide, the FCC must consider the following:

- **Mobile service is a complement to, not a replacement for, fixed broadband.** Mobile service is integral to the lives of many. However, mobile service as it is currently available to consumers does not provide equitable access to the internet when compared to a fixed home connection. Significant limitations of mobile service, including prohibitive cost, unreliable service, data caps and limited accessibility, should disqualify mobile service as a substitute for fixed home broadband. Additionally, the FCC should not consider 5G services a substitute for fixed broadband, as 5G networks have not yet been commercially deployed.
- **Satellite is not broadband.** Satellite service is extremely unreliable, is expensive, has high latency, and is unable to support bi-lateral communication. Additionally, satellite plans often include restrictive data caps. Satellite should be evaluated separately from broadband deployment data.

- **FCC data vastly overstates the availability of broadband.** The FCC's Form 477 data significantly overstates broadband deployment across the country. Not only does the data allow an entire census block to be marked "served" by broadband if one household is served by a single provider, but there is no data to evaluate price and no oversight of provider-reported speeds. The numbers produced by FCC data paint a picture completely incongruous to experienced availability by real individuals.

Over-reporting the availability of fast, affordable internet access in this country would limit funding and grant opportunities for communities, would lead to less useful legislation and FCC policies, and would discount the experiences of millions of Americans who live without competitive access to broadband. The FCC must be diligent in ensuring access to high-quality internet access for all.

Respectfully,

Thomas Beresnyak
Home, PA